

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 RAQUEL LAZO
5 Assistant Federal Public Defender
6 Nevada State Bar No. 8540
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Raquel_Lazo@fd.org

12 Attorney for Louis Fahim Senegal

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Case No. 2:19-cr-062-APG-DJA

17 Plaintiff,

18 **STIPULATION TO CONTINUE**
RESPONSE DEADLINE TO
GOVERNMENT'S OBJECTION TO
THE REPORT AND
RECOMMENDATION (ECF NO. 52)
(Second Request)

19 v.

20 LOUIS FAHIM SENEGAL,

21 Defendant.

22 **ORDER**

23 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
24 Trutanich, United States Attorney, and Shaheen Torgoley, Assistant United States Attorney,
25 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
26 and Raquel Lazo, Assistant Federal Public Defender, counsel for Louis Fahim Senegal, that the
response deadline to the Government's Objection to the Report and Recommendation (ECF No.
52) currently scheduled for Friday, January 24, 2020, be vacated and set to Friday, January 31,
2020.

1 This Stipulation is entered into for the following reasons:

2 1. On December 20, 2019, Magistrate Judge Albregts issued a Report &
3 Recommendation recommending that Senegal's Motion to Suppress Evidence be granted. ECF
4 No. 50. On January 3, 2020, the government timely filed its Objections. ECF No. 52.

5 2. Mr. Senegal's response to the government's objections is currently due on
6 January 24, 2020. The parties had been actively working towards a resolution in this case which
7 would have obviated the need for continued litigation on the motion to suppress. The parties
8 have been unable to negotiate the matter.

9 3. The requested continuance will permit Mr. Senegal sufficient time to draft and
10 file a response to the government's objections.

11 4. The defendant is incarcerated and does not object to the continuance.

12 5. The parties agree to the continuance.

13 6. The additional time requested herein is not sought for purposes of delay, but
14 merely to allow counsel for defendant sufficient time within which to be able to effectively
15 prepare a reply.

16 7. Additionally, denial of this request for continuance could result in a miscarriage
17 of justice.

18 This is the second request to continue the response deadline date filed herein.

19 DATED this 24th day of January, 2020.

20
21 RENE L. VALLADARES
22 Federal Public Defender

23
24 NICHOLAS A. TRUTANICH
25 United States Attorney

26
27 /s/ *Raquel Lazo*
28 By _____
29 RAQUEL LAZO
30 Assistant Federal Public Defender

31
32 /s/ *Shaheen Torgoley*
33 By _____
34 SHAHEEN TORGOLEY
35 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
LOUIS FAHIM SENEGAL,
Defendant.

Case No. 2:19-cr-062-APG-DJA

ORDER

ORDER

IT IS THEREFORE ORDERED that defense counsel's response to the Government's Objection to the Report and Recommendation (ECF No. 52) currently due on Friday, January 24, 2020, be vacated and continued to Friday, January 31, 2020.

Dated: January 24, 2020.

UNITED STATES DISTRICT JUDGE